

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LIANG WANG,	: Case No.
	: 1:24-cv-03356 (AS)
Plaintiff,	:
	: [rel. 1:24-cv-03348]
vs.	:
THE PHILHARMONIC SYMPHONY SOCIETY	:
OF NEW YORK, INC. AND ASSOCIATED	:
MUSICIANS OF GREATER NEW YORK, LOCAL	:
802, AMERICAN FEDERATION OF MUSICIANS,	:
Defendants.	:
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**DECLARATION OF LIANG WANG IN SUPPORT OF
MOTION FOR PARTIAL SUMMARY JUDGMENT**

LIANG WANG declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am the plaintiff. This declaration is based on my personal knowledge and a review of pertinent documents.
2. Attached as Exhibit A is a true and correct copy of an agreement between the Philharmonic-Symphony Society of New York and me, dated September 12, 2023, signed by Gary Ginstling and DeAnne Eisch, and a true and correct copy of a letter contract between the Philharmonic-Symphony Society of New York and me, signed by Martin VanBesien and Liang Wang, dated March 6, 2013.
3. Attached as Exhibit B is a true and correct copy of an email from Gary Ginstling, to me and others, dated April 13, 2024.
4. Attached as Exhibit C is a copy of a post on the Philharmonic's Facebook page signed by Gary Ginstling, dated April 18, 2024.

5. Attached as Exhibit D is a true and correct copy of an email from DeAnne Eisch, on behalf of Gary Ginstling, to me and others, dated April 19, 2024.

6. Attached as Exhibit E is a true and correct copy of an email chain between DeAnne Eisch, me and others, dated April 29, 2024.

7. Attached as Exhibit F is a true and correct copy of an email with enclosures from DeAnne Eisch, on behalf of Kristine Pizzo, to me and others, dated May 7, 2024.

8. Attached as Exhibit G is a true and correct copy of an email from DeAnne Eisch on behalf of Gary Ginstling, to me and others, dated May 27, 2024.

9. Attached as Exhibit H is a true and correct copy of the Bylaws of the American Federation of Musicians of the United States and Canada, revised September 15, 2023.

10. Attached as Exhibit I is a true and correct copy of the Trade Agreement between the Philharmonic and Local 802 currently in effect.


11. During my time as a member of the orchestra, both before my wrongful termination in 2018, and after my reinstatement in 2020, the Philharmonic has consistently scheduled me for performances and rehearsal at a level commensurate with the scheduling of other musicians.

12. Since September 18, 2023, the Philharmonic has paid me in accordance with the terms of Exhibit A, except that it has failed to pay me “additional remuneration” for the cancelled concerto solos.

13. I was scheduled to perform three concerto solos starting on May 8, 2024, but they were effectively cancelled by the Philharmonic when it suspended me on April 13, 2024, and in any event were explicitly canceled on April 17, 2024. The solos had been on the Philharmonic’s schedule for well over a year.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
July 29, 2024



A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the left. The signature is positioned above a horizontal line.

Liang Wang